

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MONICA CANNON-GRANT,

Defendant.

Case No. 22-CR-10057-AK

GOVERNMENT’S PROPOSED PRETRIAL DISCLOSURE AND FILING DATES

In an effort to comply with the Court’s instructions during the status conference held on July 17, 2024 (*see* Dkt. No. 157), the government submits the following proposed deadlines for pretrial filings and disclosures, in advance of the trial in this matter scheduled for December 2, 2024. The Court instructed the parties to file a joint proposed scheduling order; however, the government contacted defense counsel, Christopher L. Malcolm, by email on July 22, 2024 (with proposed dates) and July 23, 2024 (to further solicit a response) but has received no reply to date.

Category	Proposed Deadline
Trial Date	December 2, 2024
Disclosure of Experts	Government: 45 days before trial (October 18, 2024) Defense: 30 days before trial (November 4, 2024)
Summary Witness Disclosures and Charts	Government: 30 days before trial (November 4, 2024) Defense: 2 weeks before trial (November 18, 2024)
Exculpatory Information under Rule 116.2 that has not been produced	60 days before trial (October 3, 2024)

Rule 404(b) Disclosures	45 days before trial (October 18, 2024)
Statements (as defined in 18 U.S.C. § 3500(e) and Fed. R. Crim. P. 26.2(f)) of witnesses each party intends to call in its or his case-in-chief	30 days before trial (November 4, 2024)
Motions in Limine, oppositions, replies, sur-replies	45 days before trial (October 18, 2024), oppositions due 2 weeks thereafter, replies 1 week thereafter, sur-replies 1 week thereafter
Proposed Jury Instructions	3 weeks before trial (November 12, 2024)
Proposed Voir Dire	30 days before trial (November 4, 2024)
Trial Brief	3 weeks before trial (November 12, 2024)
Government Exhibit List	30 days before trial (November 4, 2024)
Defense Exhibit List	30 days before trial (November 4, 2024)
Objections to Govt Exhibit List	3 weeks before trial (November 12, 2024)
Objections to Defense Exhibit List	3 weeks before trial (November 12, 2024)
Government Witness List	30 days before trial (November 4, 2024)

Defendant's Witness List	2 weeks before trial (November 18, 2024)
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Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

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Acting United States Attorney

/s/ Adam W. Deitch
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Dated: July 24, 2024

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Adam W. Deitch

Adam W. Deitch

Assistant United States Attorney

Dated: July 24, 2024